

## REMARKS

### I. Introduction

In response to the Office Action dated June 28, 2007, claims 1, 5, and 9 have been amended. Claims 1-12 remain in the application. Re-examination and re-consideration of the application, as amended, is requested.

### II. Claim Amendments

Applicant's attorney has made amendments to the claims as indicated above. These amendments were made solely for the purpose of clarifying the language of the claims, and were not required for patentability or to distinguish the claims over the prior art.

### III. Summary of the Invention

The independent claims are generally directed to associating multiple output devices with a single drawing in a computer-graphics program. A first layout and second layout of the same drawing are selected. A first output device and second output device are also selected. Further, a first output device configuration and second output device configuration are selected. Lastly, within the drawing/drawing file, the first layout is associated with the first output device and first output device configuration. Further, within the same drawing/drawing file, the second layout is associated with the second output device and second output device configuration. Accordingly, the associating occurs within the drawing itself and there are multiple output devices and output device configurations associated with different layouts within the same drawing.

In view of the above, one may understand that the invention allows the user to establish on or more output views, each representing different output devices within the same drawing. Such an invention provides an advantage over the prior art in that the user can establish more than one output device within the same drawing. In the prior art, only one output device can be established at a time and an explicit device change is required to set up and redirect the output to an alternate device.

#### IV. Non-Art Rejections

In paragraphs (3)-(4) of the Office Action, claims 1-12 were rejected under 35 U.S.C. §112, first paragraph, as failing to comply with the enablement requirement. Namely, the action rejects the claim limitation of “within said drawing”.

Applicant respectfully disagrees with and traverse such rejections. The application clearly and sufficiently supports such claim limitations. In this regard, Applicant refers the Examiner to the following portions of the originally filed application: page 12, lines 15-23; page 13, lines 1-6; page 18, line 14-page 19, line 14; page 44, lines 9-12; page 45, lines 4-5; the Table on page 45, lines 15-page 46, line 1; page 46, lines 7-13; page 47, lines 11-13; FIG. 7A and 7B, and FIGs. 9 and 10.

As can be seen from this text in the originally filed specification, the associating is performed within the drawing. In this regard, Applicant notes that the application makes it abundantly clear through both the text and figures that the various layouts, output devices, and output device configurations are associated with each other all within the same drawing.

In addition to the above, Applicant notes that MPEP 2164.01 sets forth the test for determining whether a specification is enabling:

Any analysis of whether a particular claim is supported by the disclosure in an application requires a determination of whether that disclosure, when filed, contained sufficient information regarding the subject matter of the claims as to enable one skilled in the pertinent art to make and use the claimed invention. The standard for determining whether the specification meets the enablement requirement was cast in the Supreme Court decision of *Mineral Separation v. Hyde*, 242 U.S. 261, 270 (1916) which postured the question: is the experimentation needed to practice the invention undue or unreasonable?

It is clear under this standard that experimentation needed to practice the presently claimed invention is not undue or unreasonable. In this regard, the ability to associate the layout with an output device and an output device configuration within the drawing itself does not require any undue or unreasonable experimentation.

In view of the above, Applicant respectfully requests withdrawal of the rejections.

#### V. Prior Art Rejections

On pages (3)-(6) of the Office Action, claims 1-12 were rejected under 35 U.S.C. §103(a) as being obvious in view of the combination of Spyglass Prism Concepts and Applications, 1997

Spyglass, Inc., pp. 1-8 (Spyglass) and Microsoft Word 97, Microsoft Corporation 1997, screenshots pp. 1-4 (Microsoft). Applicant respectfully traverses these rejections.

Specifically, the independent claims were rejected as follows:

In regard to independent claim 1, Spyglass teaches a proxy server for customizing Web pages in order to conform to constraints of multiple non-PC output devices (Spyglass page 2 - at top). Web pages typically contain illustrations, drawings, etc., as evidenced by the Web page at Spyglass page 7, showing a map of Chicago (a form of drawing) (compare with claim 1 "*A computer implemented method for associating multiple output devices with a drawing...*").

Spyglass does not specifically teach its program as a "graphics" program. However, Word 97 teaches a document editor comprising the capability of creating and editing drawings and pictures (Word 97 pages 1-3). Word 97 also has the capability of dealing with Web pages, and saving work as HTML (Word 97 page 2, 4) (compare with claim 1 "*... in a computer-implemented graphics program comprising*"). It would have been obvious to one of ordinary skill in the art at the time of the invention to apply Word 97's graphic editing to Spyglass, providing Spyglass's server the benefit of customized editing of images and drawings on a Web page.

Spyglass teaches a user logging on to the Spyglass server, said server looks for a Web page (i.e. drawing) via user requested URL within its cache. If its stored page is already converted (a first layout), said server selects said page on behalf of the user (Spyglass page 2, and page 3 section "Caches content", and page 5 - top paragraph; compare with claim 1 "*selecting a first layout of said drawing*").

Spyglass teaches a "Device Database" which stores various device information and conversion characteristics for conversion purposes (Spyglass page 2, 4). Spyglass references this database accordingly (compare with claim 1 "*selecting a first output device; selecting a first output device configuration*").

Spyglass teaches fetching from its cache a Web page which has already been converted for a specific output device (Spyglass page 5 - top paragraph). In order to recognize the correct converted page (layout), Spyglass must know the intended output device with its device configuration, therefore an association exists accordingly (compare with claim 1 "*associating ... said first layout with said first output device and said first output device configuration*").

Spyglass teaches a user logging on to the Spyglass server using a different device, said server looks for a Web page (i.e. drawing) via user requested URL within its cache. If its stored page is already converted (a first layout), said server selects said page on behalf of the user (Spyglass page 2, and page 3 section "Caches content", and page 5 - top paragraph; compare with claim 1 "*selecting a second layout of said drawing*").

Spyglass teaches a "Device Database" which stores various device information and conversion characteristics for conversion purposes (Spyglass page 2, 4). Spyglass references this database accordingly (compare with claim 1 "*selecting a second output device; selecting a second output device configuration*").

Spyglass teaches fetching from its cache a Web page which has already been converted for a specific output device (Spyglass page 5 - top paragraph). In order to recognize the correct converted page (layout), Spyglass must know the intended output device with its device configuration, therefore an association exists accordingly (compare with claim 1 "*associating ... said second layout with said second output device and said second output device configuration*").

Spyglass teaches two output views of a Web page, one view with a map, one (PDA) view without (see Spyglass page 7). Spyglass does not specifically teach associating "*within said drawing*" a first and second layout. However, since Spyglass teaches conversion to various devices, with all conversions using the original requested Web page (with original image) as a base point, it would have been obvious to one of ordinary skill in the art at the time of the invention for the skilled artisan to interpret a scenario comprising two output devices keeping the same map of Chicago (i.e. a PC and a laptop, etc.) Both said devices typically interpret .gif images, but can be customized in other ways

commensurate with their respective capabilities, therefore creating two layouts associated with the same base image.

Applicant traverses the above rejections for one or more of the following reasons:

- (1) Neither Spyglass nor Word teach, disclose nor suggest a layout of a drawing that comprises a view of the drawing;
- (2) Neither Spyglass nor Word teach, disclose nor suggest associating both a first layout and a second layout with a first output device and second output device respectively within the same drawing;
- (3) Neither Spyglass nor Word teach, disclose nor suggest associating both a first layout and a second layout with a first output device configuration and second output device configuration respectively within the same drawing;
- (4) Neither Spyglass nor Word teach, disclose nor suggest associating a first layout with a first output device and first output device configuration, and a second layout with a second output device and second output device configuration within the same drawing;
- (5) Neither Spyglass nor Word teach, disclose nor suggest an associating that is within a drawing of two different output devices and two different layouts for the drawing; and
- (6) Neither Spyglass nor Word teach, disclose or suggest a computer-aided design (CAD) application or a layout within a CAD application.

As described above, the independent claims are generally directed to associating multiple output devices with a single drawing in a computer-graphics program. A first layout and second layout of the same drawing are selected. As amended the first and second layouts both comprise views of the same drawing.

A first output device and second output device are also selected. Further, a first output device configuration and second output device configuration are selected. Lastly, within the drawing/drawing file, the first layout is associated with the first output device and first output device configuration. Further, within the same drawing/drawing file, the second layout is associated with the second output device and second output device configuration. Accordingly, the associating

occurs within the drawing itself and there are multiple output devices and output device configurations associated with different layouts within the same drawing.

In view of the above, one may understand that the invention allows the user to establish one or more output views, each representing different output devices within the same drawing. Such an invention provides an advantage over the prior art in that the user can establish more than one output device within the same drawing. In the prior art, only one output device can be established at a time and an explicit device change is required to set up and redirect the output to an alternate device.

Firstly, Applicant notes that neither Spyglass nor Word teach, describe, nor suggest a computer-aided design (CAD) application as claimed. The Action asserts that such an application is merely but one type of a computer graphics program. While a CAD application is a type of computer graphics program, there are specific properties and attributes of a CAD application that are unique to CAD applications and which require additional functionality. It is such uniqueness and functionality that the present invention addresses. In this regard, Applicants note that a layout is a view of a drawing. Drawing layouts and views are set forth in the specification (see page 3, lines 1-4; page 12, line 5-page 13, end). Further, the use of layouts in CAD applications are well defined and have a well-understood meaning in the art. The problem that the present invention addresses is unique to such CAD applications. In this regard, Applicant directs the attention of the Examiner to the background of the invention on page 1, line 15-page 2, line 10 et seq. Namely, in CAD applications, the same image may have multiple different layouts/views of the image defined within the same drawing/drawing file. In the prior art, it was impossible to store multiple specific output devices and output device configurations within a single drawing/drawing file (e.g., associated with the different layouts/views). The present invention solves such a problem.

Second, as claimed (and as stated above), the presently claimed invention provides the ability to associate multiple output devices and output device configurations with different views of the same drawing, all within the same drawing. Neither Spyglass nor Word even remotely address such a problem, solution, or claim limitations. As stated in the prior Office Action response, Spyglass teaches the use of two databases - a user database (to track information such as user preferences) and a device database (containing characteristics of various devices). When a URL is requested by a user, the Spyglass product intercepts the request, accesses and retrieves data from the URL.

requested, and uses its stored data about the web site, the user, and the device to convert the data into the best format for the user's device (see page 2). In addition, Spyglass can cache content of previously-retrieved or frequently requested documents (see page 3 and 5).

However, notoriously absent from Spyglass is the ability to store or associate multiple layouts of the same drawing with multiple different output devices/output device configurations within the same drawing. Instead, Spyglass merely retrieves the web content from a URL - thus, the different layouts, output devices, and output device configurations (nor an association between such components) are not stored in or within the drawing - the website data is stored at the URL location and the different formats for the data are stored at the Spyglass proxy server. The website data can also be stored at the Spyglass proxy server but it is stored independently from other formats for the website data.

Spyglass' different converted documents are stored independently within cache. Further, Spyglass does not provide the ability to store or associate different output devices with/within the same drawing. Instead, each converted document stored in Spyglass' cache is for a single type of format and cannot be associated with multiple different output devices. There is no capability or functionality within Spyglass that allows a converted document (which has been converted for a particular user device) to be associated with multiple different devices as claimed. Further, Spyglass fails to provide any capability or functionality to store multiple different associations within the same drawing. Instead, Spyglass' device database merely consists of characteristics of different devices which is accessed to perform the appropriate conversion (that is eventually stored in cache). Such a database is not the drawing itself (and thereby fails to meet the explicit claim limitations). Accordingly, the specific and explicit functionality set forth in the present claims are far from being even remotely hinted at in Spyglass.

In response to these previously submitted arguments, the new Office Action asserts that Spyglass teaches conversion to various devices and it would have been obvious that two devices can establish an output view within the same drawing (i.e., both a PC and a laptop can support Spyglass's map of Chicago, but may differ in outer output capabilities). Applicant respectfully disagrees and traverses such an assertion. In the prior art, there was no possibility nor an inclination to associate multiple outputs, multiple output devices, or multiple output device configurations within the same drawing. Instead, in direct contradiction to such an invention, Spyglass explicitly

teaches independent storage in a cache wherein the cache contents has to be retrieved once the output device is determined. Such a teaching expressly teaches away from the presently claimed invention directed towards the multiple devices and device configurations being associated within the same drawing/drawing file. Again, there is not even a remote suggestion in Spyglass or Word to conduct such multiple associations for different layouts in the same drawing as claimed. In this regard, it is only with hindsight based on the disclosure of the present invention, that the Examiner is able to summarily find such obviousness. Such hindsight is impermissible under the MPEP and current state of the law.

Moreover, the various elements of Applicant's claimed invention together provide operational advantages over Spyglass and Word. In addition, Applicant's invention solves problems not recognized by Spyglass and Word.

Thus, Applicant submits that independent claims 1, 5, and 9 are allowable over Spyglass and Word. Further, dependent claims 2-4, 6-8, and 10-12 are submitted to be allowable over Spyglass and Word in the same manner, because they are dependent on independent claims 1, 5, and 9 respectively, and thus contains all the limitations of the independent claims. In addition, dependent claims 2-4, 6-8, and 9-12 recite additional novel elements not shown by Spyglass and Word.

VI. Conclusion

In view of the above, it is submitted that this application is now in good order for allowance and such allowance is respectfully solicited. Should the Examiner believe minor matters still remain that can be resolved in a telephone interview, the Examiner is urged to call Applicant's undersigned attorney.

Respectfully submitted,

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